



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Mr. Joel L. Olener
13723 Aspen Cove Drive
Houston, Texas 77077

AUG 29 2016

Mr. Olener :

This letter is in response to your Freedom of Information Act (FOIA) request HQ-2016-005301 :

On March 31, as reported by BNA, Cynthia Giles, the EPA's assistant administrator for the Office of Enforcement and Compliance Assurance, said that there are "multiple" studies that show the independence of an auditor makes a "huge difference" in ensuring that a facility is in compliance with regulatory requirements. First, will you please send me all the references to these "multiple" studies, in both electronic and documentary formats? My request includes, but is not limited to, the sources of these studies, the written reports of the studies, who did them, when they were done, and any conclusions the author(s) made? Second, Assistant Administrator Giles referred to auditor independence as making a "huge difference" in ensuring compliance with regulatory requirements. Will you please send me all the references related to these studies, in both electronic and documentary formats? My request includes, but is not limited to, the sources of these studies, the written reports of the studies, who did them, when they were done, any conclusions the author(s) made? Thank you. Joel Olener

A summary of the literature on this topic is presented in a Harvard Kennedy School working paper, "The Integrity of Private Third-Party Compliance Monitoring" at <http://www.hks.harvard.edu/centers/mrcbg/programs/rpp/publications>. We have also attached to this letter other information that may be helpful.

This letter concludes our response to your request. You may appeal this response by email at hq.foia@epa.gov, or by mail to the National Freedom of Information Office, U.S. EPA, 1200 Pennsylvania Avenue, N.W. (2822T), Washington, DC 20460 (U.S. Postal Service Only). Only items mailed through the United States Postal Service may be delivered to 1200 Pennsylvania Avenue, N.W. If you are submitting your appeal via hand delivery, courier service, or overnight delivery, you must address your correspondence to 1301 Constitution Avenue, N.W., Room 6416J, Washington, DC 20001. Your appeal must be made in writing, and it must be received no later than 90 calendar days from the date of this letter. The Agency will not consider appeals received after the 90 calendar

day limit. Appeals received after 5:00 pm EST will be considered received the next business day. The appeal letter should include the FOIA tracking number listed above. For quickest possible handling, the subject line of your email, the appeal letter, and its envelope, if applicable, should be marked "Freedom of Information Act Appeal." Additionally, you may seek assistance from EPA's FOIA Public Liaison at hq.foia@epa.gov or (202)566-1667, or from the Office of Government Information Services (OGIS). You may contact OGIS in any of the following ways: by mail, Office of Government Information Services, National Archives and Records Administration, Room 2510, 8610 Adelphi Road, College Park, MD 20740-6001; e-mail, ogis@nara.gov; telephone, 301-837-1996 or 1-877-684-6448; and facsimile, 301-837-0348.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Miles", written over a horizontal line.

Erin Miles
Chief of Staff